

**FILED**

OCT 10 2001

RICHARD W. WIEKING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSEDAVID W. SHAPIRO (NYSBN 2054054)  
United States AttorneyUNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

UNITED STATES OF AMERICA,

**CR**

Criminal No.

**20160 JF**

Plaintiff,

v.

ROBERT JAY TASHBOOK,

Defendant.

VIOLATIONS: 18 U.S.C. § 2422(b) --  
Enticing a Minor to Engage in Unlawful  
Sexual Conduct; 18 U.S.C. § 2423(a) --  
Interstate Transportation of a Minor with  
Intent Minor Engage in Unlawful Sexual  
Conduct; 18 U.S.C. § 2251(a) -- Sexual  
Exploitation of a Minor (Production of  
Child Pornography) with Two Prior  
Convictions for Sex Offenses; 18 U.S.C.  
§ 2252(a)(2) -- Receipt of Sexually Explicit  
Visuals with Prior Conviction for Sex  
Offense; § 2 -- Aiding and Abetting

SAN JOSE VENUE

INDICTMENT

The Grand Jury charges that:

COUNT ONE (18 U.S.C. § 2422(b) -- Enticing a Minor to Engage in Unlawful Sexual Conduct;  
§ 2 -- Aiding and Abetting )Beginning in or about April 2001, and continuing through on or about May 4, 2001, in the  
County of Santa Clara, Northern District of California, and elsewhere, the defendant

ROBERT JAY TASHBOOK

did use a facility and means of interstate commerce to attempt to persuade, induce, entice and

INDICTMENT

1 coerce a person under the age of eighteen to engage in sexual activity with the defendant and  
2 others that would violate California Penal Code, Sections 261.5 and 288a, all in violation of Title  
3 18, United States Code, Sections 2422(b) and 2.

4  
5 COUNT TWO (18 U.S.C. § 2423(a) -- Interstate Transportation of a Minor with Intent the  
Minor Engage in Unlawful Sexual Conduct; § 2 --Aiding and Abetting)

6 On or about May 4, 2001, in the County of Santa Clara, Northern District of California, and  
7 elsewhere, the defendant

8 ROBERT JAY TASHBOOK

9 did knowingly transport and attempt to transport in interstate commerce a person under the age of  
10 eighteen, to wit: a minor from Pennsylvania to Maryland by taxi cab, from Maryland to Missouri  
11 by commercial airline, and from Missouri to California by commercial airline, with the intent  
12 that this minor engage in sexual activity with the defendant and others that would violate  
13 California Penal Code, Sections 261.5 and 288a, all in violation of Title 18, United States Code,  
14 Sections 2423(a) and 2.

15 COUNTS THREE THROUGH FIVE: (18 U.S.C. § 2251(a) -- Sexual Exploitation of a Minor  
16 with Two Prior Convictions for Sex Offenses; § 2 --  
Aiding and Abetting)

17 Beginning in or about April 2001, and continuing through on or about April 24, 2001, in  
18 the County of Santa Clara, Northern District of California, and elsewhere, the defendant

19 ROBERT JAY TASHBOOK,

20 having been previously convicted on or about May 4, 1996 of violating Title 18, United States  
21 Code, Section 2423(b), and on or about May 14, 1996 of violating Title-18, United States Code,--  
22 Section 2252(a)(4)(B), did persuade, induce, entice and coerce a person under the age of eighteen  
23 to engage in sexually explicit conduct, specifically, simulated masturbation by said minor and the  
24 lascivious exhibition of the genitals of said minor, for the purpose of producing a visual  
25 depiction of such conduct, namely, the following three visual depictions set forth below,  
26 knowing and having reason to know the visual depiction would be mailed and shipped from

27 ///

28 INDICTMENT

Pennsylvania to California in interstate commerce, in violation of Title 18, United States Code, Sections 2251(a) and 2:

Count	Description of Photograph
3	Naked Minor Standing
4	Naked Minor Lying on Back
5	Naked Minor on Hands and Knees

COUNT SIX: (18 U.S.C. § 2252(a)(2) -- Receipt of Sexually Explicit Visuals with Prior Conviction for Sex Offense; § 2 --Aiding and Abetting)

On or about April 24, 2001, in the County of Santa Clara, State and Northern District of California, and elsewhere, the defendant

ROBERT JAY TASHBOOK,

having been previously convicted on or about May 4, 1996 of violating Title 18, United States Code, Section 2423(b), and on or about May 14, 1996 of violating Title 18, United States Code, Section 2252(a)(4)(B), did knowingly receive a visual depiction of a minor engaging in sexually explicit conduct, specifically, the three visual depictions of said minor described above in Counts Three through Five, that had been mailed and shipped in interstate commerce, to wit: mailed

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INDICTMENT

1 from Pennsylvania to California via the United States Postal Service, all in violation of Title 18,  
2 United States Code, Sections 2252(a)(2) and 2.


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4 DATED:

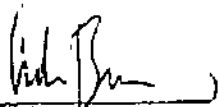
A TRUE BILL.

5  
6 10/9/2001

7   
FOREPERSON

8 DAVID W. SHAPIRO  
9 United States Attorney

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12 ELIZABETH DE LA VEGA  
13 Chief, San Jose Branch

14 (Approved as to form: )

15 AUSA Braun

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INDICTMENT